

Eddie R. Jimenez (SBN 10376)
ejimenez@aldridgepite.com
ALDRIDGE PITE, LLP
7220 South Cimarron Road, Suite 140
Las Vegas, NV 89113
Telephone: (858) 750-7600
Facsimile: (619) 590-1385

Mailing Address:

4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, California 92177-0933

Attorneys for CitiMortgage, Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re: MELANI SCHULTE and
WILLIAM SCHULTE,

2704 SATTLEY LLC,
HOT ENDEAVOR LLC,
1341 MINUET LLC,
1708 PLATO PICO LLC,
2228 WARM WALNUT LLC,
9425 VALLEY HILLS LLC,
9500 ASPEN GLOW LLC,
5218 MISTY MORNING LLC,
CHERISH LLC, SABRECO Inc.,
KEEP SAFE LLC

Bankruptcy Case No. 09-29123-mkn

Chapter 11

Jointly Administered with:

09-27238-BAM
09-27909-BAM
09-27910-BAM
09-27911-BAM
09-27912-BAM
09-27913-BAM
09-27914-BAM
09-27916-BAM
09-28513-BAM
09-31584-BAM
09-31585-BAM

**AMENDED STIPULATION TO
CONTINUE HEARING ON DEBTOR'S
AMENDED MOTION FOR CONTEMPT
FOR VIOLATION OF THE
AUTOMATIC STAY AND DISCHARGE
INJUNCTION, FAILING TO COMPLY
WITH COURT ORDER AND THE
CONFIRMED PLAN AND FOR
DAMAGES INCLUDING ATTORNEYS
FEES AGAINST CREDITOR,
CITIMORTGAGE INC. (DKT 1283)**

Current Hearing:

Date: October 7, 2020

Time: 9:30 a.m.

Judge: Hon. Mike K. Nakagawa

Melanie Schulte (“Debtor”), by and through her counsel of record, Christopher Burke, and CitiMortgage, Inc. (“Citi”), by and through its attorneys Aldridge Pite, LLP, hereby file this *Stipulation to Continue Hearing on Debtor’s Amended Motion for Contempt for Violation of the Automatic Stay and Discharge Injunction, Failing to Comply with Court Order and the Confirmed Plan and for Damages Including Attorneys’ Fees Against Creditor, CitiMortgage, Inc.* (“Motion for Contempt”) [Docket 1283], currently scheduled for hearing on October 7, 2020, at 9:30 a.m. Citi and Debtors (the “Parties”) are discussing potential resolution and more time is needed. Based upon the foregoing, the Parties are stipulating to continue the hearing on the Motion for Contempt and related deadlines.

IT IS HEREBY STIPULATED AND AGREED that the hearing on the Motion for Contempt, which is presently scheduled for October 7, 2020 at 9:30 a.m. shall be continued to November 18, 2020, at 9:30 a.m.

IT IS HEREBY STIPULATED AND AGREED that Citi shall have until October 2, 2020 to file a Response to the Motion for Contempt.

IT IS HEREBY STIPULATED AND AGREED that Debtor shall have until October 19, 2020 to file a Reply to Citi’s Response to the Motion for Contempt.

IT IS SO STIPULATED

Respectfully submitted,

ALDRIDGE PITE, LLP

Dated: 10/8/20

/s/ Eddie R. Jimenez

EDDIE R. JIMENEZ

Attorneys for CitiMortgage, Inc.

Dated: 9/24/20

/s/ Christopher Burke (with authorization)

CHRISTOPHER BURKE

Attorney for Debtor Melanie Schulte